

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Hyounea Kim)
Plaintiff,) Case No. 17-cv-7332
v.) Judge Ronald A. Guzman
Hilton Construction Group, Degen Consulting) Magistrate Jeffrey Cole
Group, and Hilton Mayers)
Defendants,))

MOTION FOR DEFAULT JUDGMENT

Plaintiff, Hyounea Kim (“Plaintiff”) respectfully requests this Court to enter Default Judgment against corporation defendants Hilton Construction Group, Degen Consulting Group and Individual Defendant Hilton Mayers and in support states as follows:

1. Plaintiff filed her three counts Complaint under the Fair Labor Standards Act (“FLSA”), the Illinois Minimum Wage Law (“IMWL”), and the Illinois Wage Payment and Collection Act (“IWPCA”) on October 11, 2017. See Docket 1 Complaint.
2. Defendants Hilton Construction Group, Degen Consulting Group, and Hilton Mayers had been represented by attorney Sally Comin but she withdrew as counsel on December 21, 2017. And Defendants were ordered to appear at the next status hearing. See Docket 19 Minute Order.
3. On a status hearing of February 6, 2018, Individual Defendant Hilton Mayers only appeared in Court on behalf of himself. Corporation Defendants did not appear in Court by counsels as court ordered.

4. Plaintiff was granted to file a Motion for Default against corporation defendants. See Docket 21 Minute Order.
5. On a status hearing of March 8, 2018, Plaintiff's motion for Default Judgment against corporation defendants was granted. See Docket 27 Minute Order.
6. On a status hearing of March 29, 2018, Individual defendant Hilton Mayers nor counsel did not appear in Court.
7. On March 29, 2018, attorney Charles Edward McElvenny filed Attorney Appearance for Defendants.
8. But on the next status hearing of April 19, 2018, yet Defendants' counsel did not present in Court, the court granted Plaintiff to file Renewed Motion for Default Judgment.

WHEREFORE, Plaintiff respectfully requests this Court to enter:
Judgment that the plaintiff recovers of and from corporation Defendants Hilton Construction Group, Degen Consulting Group and Individual Defendant Hilton Mayers the amount of Plaintiff's unpaid wage for all hours which Plaintiff worked 40 hours per week or all hours Plaintiff worked if he worked less than 40 hours and Punitive damages pursuant to the formula set forth in 820 ILCS105/12(a); Reasonable attorney's fees and costs incurred in filing this action; and Such other and further relief as this Court deems appropriate and just.

Respectfully submitted,

/s/ Ryan J. Kim
One of the Plaintiff's Attorneys

Ryan J. Kim, Esq.
2454 E. Dempster Street, Suite 301
Des Plaines, Illinois 60016
(847) 905-6262
ryan@RyanKimLaw.com